

TCG

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Teleport Communications Group
Regulatory & External Affairs
2 Lafayette Centre, Suite 400
1133 21st Street, N.W.
Washington, DC 20036
Tel: 202.739.0033
Fax: 202.739.0044

October 23, 1997

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OCT 23 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: Notification of Oral Ex Parte Communication: Application of BellSouth
Telecommunications Inc. And BellSouth Long Distance, Inc. For Provision of In-
Region, InterLATA Services in South Carolina
CC Docket No. 97-208

Dear Mr. Caton:

Yesterday, on October 23, 1997, Paul Kouroupas, Vice President, Michael McRae, Counsel, and I met with Michelle Carey, Jordan Goldstein, Melissa Newman, Michael Pryor, Anu Seam, Florence Setzer, Daniel Shiman, Jeannie Su, Rob Tanner, and Steven Teplitz of the Policy and Program Planning Division to discuss the above-referenced application. TCG discussed the experiences it has had with BellSouth in Florida, as outlined in detail in the attached documents. Signed versions of the attached letters were sent to BellSouth in April and August, as indicated.

An original and one copy of this letter and its attachments are being submitted in accordance with Sec. 1.1206(b)(2) of the Commission's rules.

Thank you very much for your assistance in this matter.

Sincerely,



Judith E. Herrman
Manager, Federal Regulatory Affairs

cc: Michelle Carey
Melissa Newman
Anu Seam
Daniel Shiman
Rob Tanner

Jordan Goldstein
Michael Pryor
Florence Setzer
Jeannie Su
Steven Teplitz

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

August 21, 1997
(via fax)

Mr. Bill French
Sales Director
BellSouth Telecommunications
3535 Colonnade Parkway
Room E4E1
Birmingham, AL 35243

Dear Bill:

Thank you for your response to the escalation of numerous issues raised over the last several months. I would like to answer the questions you have raised in your letter dated August 14, 1997, and comment on your understanding of the disposition of many of these issues. In addition, those items brought to BST's attention since June 18, 1997 which remained unaddressed are included as well.

April 10, 1997 letter to Fred Monacelli

Billing

Billing related issues were discussed at the meetings May 5 and 6, as well as July 17, 1997. The following issues still remain open and unaddressed by BST.

- 1) Billing Interconnection Percentages (BIPs) must be concurred in by BST and TCG for Interexchange Carrier (IC) meet-point billed traffic. I have requested that BST calculate the BIPS for TCG's concurrence, or in the alternative have suggested TCG will calculate for BST's concurrence. To date BST has argued that interoffice facilities leased from BST, and paid for by TCG, will be included in the BST percentage and recovered by BST. BST is not authorized to collect revenues for facilities leased by TCG for provision of TCG switched access services. Until BST revises their position no concurrence can be reached.
- 2) BIPs must be concurred in by BST and TCG for Independent Telephone Company, Competitive Local Exchange Carrier, Wireless, etc. meet-point billed traffic. I have

requested that BST calculate the BIPS for TCG's concurrence, and have pointed out that TCG cannot calculate these percentages as TCG is unaware of the established meet-points (V&H coordinates) between BST and the above referenced carriers. To date BST has not agreed to provide these BIPs for TCG's concurrence.

- 3) No meet-point billing records have been provided by BST to enable TCG to bill for the switched access services it is providing to ICs.

Ordering

TCG's interpretation of the term 'reciprocal' as it applies to trunk groups would translate to both a 'tandem' trunk group and/or an 'end office' trunk group. TCG installs separate trunk groups for tandem versus end office interconnection. BST, however, augments the existing tandem trunk group.

Your letter mentions optimum cost effectiveness, network effectiveness and network efficiency as BST's prerogative under the Agreement. TCG continues to experience complaints from its customers who state their customer base is experiencing difficulty reaching them since their local service was changed to TCG. TCG's numerous complaints regarding this issue have yet to resolve the problem. It is BST's continued objection to install reciprocal end office trunk groups which is partly attributable to this problem.

Others

The following items were originally captured under this agenda heading and remain open issues from TCG's perspective.

- 1) TCG has sent several letters to BST requesting the disposition of Route Set translations to enable TCAP functionality.
- 2) Despite numerous requests BST has failed to provide notification of the Operator Services tandems to which TCG must order facilities to purchase Operator and Directory Assistance Services from BST. In this instance TCG is attempting to purchase service from BST but has had to endure numerous conference calls and subsequent delays by BST.
- 3) BST has recently directed TCG to purchase SS7 point code information from BellCore. TCG has complied. However, BellCore is not in possession of point code or capability code information related to BST's STPs. Please ensure that this information will be provided as TCG currently provides point code and capability code information to BST free of charge.
- 4) BST has yet to provide plans for compliance with the 1996 Telecommunications Act with respect to making its Operational Support Systems available.

Interconnection Agreement

- 1) The License Agreement appended to Attachment C-14 has not been provided.
- 2) The Boundary Document was referenced in the Agreement executed between TCG and BST on July 15, 1996. When will this document be made available?
- 3) The E911 Local Exchange Carrier Guide for Facility-based Providers has not been

received.

June 2, 1997 letter to Bill Morrison

Bill Morrison's letter, dated July 3, 1997, raises many questions and leaves many previously raised by TCG unanswered. What are BST's 'industry standard Year 2000 compliance requirements'? What would be termed compliance certification by BST? When will compliance testing be conducted? How long will it take? How does TCG register for such testing? Is there a fee associated with this compliance testing? What are BST's 'mission critical systems'?

In addition, the following questions raised in TCG's June 2, 1997, letter were not answered:

- 1) Name of the responsible party within your organization responsible for Year 2000 compliance.
- 2) Name of the lead technical representative.
- 3) Product specific information.
- 4) Dependencies
- 5) Compatibility and interoperability.

June 5, 1997 letter to Bill Morrison

The statement made by BST on Wednesday, May 21, 1997 was that BST would not activate any code assigned to TCG prior to receipt of state certification. It is refreshing to read that BST has reversed this policy.

If you will consult with those within BST responsible for NXX code assignment, you will find that the information related to you regarding activation of NXX codes was correct. The information contained in my letter is applicable to the activation of NXX codes and not CICs. Please provide BST's policy for NXX activation and CIC activation, separately, so that future confusion may be avoided.

June 6, 1997 letter to Bill Morrison

You state that the second paragraph of my letter is not based on facts. Please provide information relative to the assertions made in that paragraph.

- 1) Does BST charge itself nonrecurring installation charges for the provision of interoffice facilities used to carry BST traffic?
- 2) Do BST and independent telephone companies charge each other nonrecurring installation charges for the provision of mutually provisioned access services?
- 3) How are these costs recovered?

Your representation that a statement attributed to me regarding TCG's payment policy is totally false. The payment of nonrecurring charges for installation of local and toll trunk groups by TCG attests to that fact.

TCG believes BST is compensated for mutually provisioned Intermediary Services through

minute of use charges it assesses. Both BST and TCG bill for that portion of the service they provide. Intermediary Service is a mutually provisioned switched service provided by both BST and TCG. TCG does not believe nonrecurring charges for installation should be assessed by BST on TCG, but that each company should bear its portion of these costs.

Outstanding items

March 20, 1997 letter to Bill Morrison

Requested the CICs for ICs translated in the BST access tandems of LATAs 470, 472 and 476.

The Agreement between BST and TCG Section IV, Paragraph L, states: "BellSouth shall provide the billing name, billing address and CIC of the Interexchange Carriers on magnetic tape or via electronic file transfer using the EMR format in order to comply with the MPB Notification Process as outlined in the MECAB document."

July 7, 1997 letter to Bill Morrison

Questions were raised specific to the Atlanta LATA. No reply has been received to date.

July 8, 1997 letter to Bill Morrison

Request was made for a response to the numerous letters sent by Wanda Montano and me regarding the issue of route sets. No response has been received to date.

July 17, 1997 letter to Bill Morrison

Information sharing was raised concerning TCG's offering of 2PIC service. No response has been received to date.

July 23, 1997 E-mail to Bill Morrison

Rate center clarification requested. No response has been received to date.

July 24, 1997 E-mail to Bill Morrison

Request for tariff reference cited in a conversation with BST concerning tandem-to-tandem signaling. No response received to date.

July 31, 1997 E-mail to Bill Morrison

Request for Operator Services tandem identification. No response received to date.

July 31, 1997 E-mail to Bill Morrison

Request for clarification of unbundled loop services. No response received to date.

Please review those issues which remained unaddressed in your letter dated August 14, 1997, as well as the numerous requests for assistance made of Mr. Morrison. I look forward to resolution of these issues and your assistance.

Regards,

Frank Hoffmann

cc: Paul Kouroupas- TCG
Fred Monacelli - BST
Tom Schroeder - TCG
Tilly Valls-McFadden, Esq. - TCG

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

April 10, 1997

Mr. Fred Monacelli
Sales Assistant Vice President
BellSouth Telecommunications
One Chase Corporate Drive
Suite 350
Hoover, AL 35244

Dear Fred:

I would like to take the opportunity to thank you and the Interconnection Services team for meeting with Teleport Communications Group (TCG) last Friday at your headquarters in Atlanta. Your attitude towards TCG was refreshing and I look forward to developing a relationship and working together with you and your team during the coming years.

This letter is intended as a follow-up to our meeting and provides an itemized description of the items tabled at that meeting for later discussion as agreed. Please review these issues and feel free to add any items you feel are not addressed. I would like to use these issues as the starting point for discussions at our next meeting. I have grouped the issues by category to the extent possible.

Billing

- Application of nonrecurring charges for (i) interconnection, (ii) meet-point and (iii) gateway trunk groups.
- Switched access revenue due TCG on BellSouth Telecommunications (BST) telephone numbers ported to TCG via INP.
- PIU/PLU factors
 - IXC PIU factors required for meet-point trunk groups.
 - PLU factors required for interconnection trunk groups.
- BIPs required to apportion mileage for meet-point trunk groups.
- Recording, auditing and reconciliation of local interconnection traffic in accordance with the BST/TCG Interconnection Agreement.
- Recording and billing of toll interconnection traffic in accordance with the BST/TCG Interconnection Agreement.
- Meet-point billing record exchange.
- BAN assignment by trunk group type.

- Rate charged for local/toll traffic exchange (review of Attachment B-1).
- Late payment charges. Application during reconciliation process.
- E 911 trunking charges. Identification of BAN under which charging is occurring.

Numbering

- NXX
 - Assignment
 - Exhaust/Jeopardy
- Interim Number Portability Plan for 305/954 NPA split in Broward County, FL.
- HPNA vs FNPA (& digit vs 10 digit dialing)

Ordering

- Reciprocity
 - TCG position
 - * For each access tandem routed trunk ordered by TCG that BST will reciprocate by ordering an access tandem routed trunk.
 - * For each end office trunk ordered by TCG that BST will reciprocate by ordering an end office routed trunk.
 - BST position
 - * For each trunk ordered by TCG, either access tandem routed or end office routed, that BST will reciprocate by ordering an access tandem routed trunk.
- Independent Telephone Companies

Other

- Contacts and escalation lists.
- Route Sets. Required to permit transfer of TCAP messages between TCG and BST networks. These route sets correlate switch point codes with their respective assigned NPA NXXs (See attached letters dated 10/8/96 and 10/11/96 to Mr. Dender).
- Directory Assistance
 - Implementation schedule if purchased by TCG.
 - BST efforts to comply with FCC order.
- Alabama/Tennessee implementation issues
 - E 911
 - * List of E 911 access tandems by LATA.
 - * List of rate centers served by each E 911 tandem.
 - * List of PSAPs which subtend each E 911 access tandem by LATA.
 - * MSAG
 - SS7
 - * List of point codes for switches by LATA.
 - Access Tandems
 - * List of access tandem points of interconnection by LATA.
 - Independent Telephone Companies (ICO)
 - * List of those ICOs not directly connected to BST by LATA.
- Operational Support Systems (OSS)
 - NDM connectivity

- Telcom Act compliance/availability

Interconnection Agreement

- Documents required
 - Guide to Access (pg. 7 of Facility Based Guidelines)
 - License Agreement (appendix to Attachment C-14)
 - Boundary Document (Attachment to C-18)
 - E 911 Local Exchange Carrier Guide for Facility Based Providers
 - Facility Based Guidelines
- Unbundled loop cross-connect charge (See attached letter dated 2/12/97 from Susan Arrington)

Again, I would like to thank you for the opportunity to meet with you and other members of the BST Interconnection Services team Friday morning in Atlanta, and look forward to working with you in the future. I would like to schedule a two day meeting between BST and TCG at your earliest convenience to discuss the issues raised at our meeting in Atlanta. I can be reached on (410) 649-0303 and my fax number is (410) 649-0332.

Regards,

Frank Hoffmann
Regional Director - Carrier Relations
Southern Region

cc: Wanda Montano - TCG
Jim Washington - TCG
Bill Morrison - BST
Pinky Reichert - BST